

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

STATE OF TEXAS	§	
Plaintiff,	§	
v.	§	
	§	
ALEJANDRO MAYORKAS, in his official capacity as Secretary of Department of Homeland Security; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; MERRICK GARLAND, in his official capacity as Attorney General of the United States; UNITED STATES DEPARTMENT OF JUSTICE Defendants.	§ § § § § § § § § §	CIVIL ACTION NO. 2:23-CV-00024-AM

PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGE ALIA MOSES:

Plaintiff State of Texas seeks an extension of time to file a responsive pleading in response to Defendants’ Motion to Dismiss Complaint [ECF No. 20].

Currently, Plaintiff’s deadline to respond to the Motion to Dismiss is September 14, 2023. Undersigned counsel requests a 60-day extension to file a responsive pleading because counsel for Plaintiff has numerous professional obligations during the next two months.

Accordingly, Plaintiff respectfully requests that its responsive pleading deadline be extended to November 13, 2023. This motion is unopposed. The requested extension is reasonable and necessary to allow Plaintiff adequate time to prepare its response. This request is not for delay, but so that justice may be served.

Respectfully submitted,

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Provisional Attorney General of Texas

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/s/ *Kimberly Gdula*

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with opposing counsel, and Defendants confirmed they are unopposed to the relief requested herein.

/s/ Kimberly Gdula
KIMBERLY GDULA
Deputy Chief

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2023, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served on all attorney(s) and/or parties of record, via the CM/ECF service.

/s/ Kimberly Gdula
KIMBERLY GDULA
Deputy Chief